## IN THE U.S. BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Derek N. Hairston : Chapter 13

Debtor : Bankruptcy No.: 19-17208-elf

\_\_\_\_\_

\*\*\*\*\*\*

Hearing to be Held: Date: March 31, 2020

Time: 1:00 pm

Place: United States Bankruptcy Court Courtroom #1, Second Floor

Robert N.C. Nix, Sr. Federal Courthouse

900 Market Street Philadelphia, PA 19107

\*\*\*\*\*\*\*

## NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Derek N. Hairston, Debtor, by and through counsel of the Ross, Quinn & Ploppert, P.C., has filed a Motion to Approve a Mortgage Loan Modification by and between Debtor and Lakeview Loan Servicing, LLC.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT AN ATTORNEY.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before March 30, 2020 you or your attorney must do ALL of the following:
  - (a). file an answer explaining your position at

United States Bankruptcy Court Eastern District of Pennsylvania Robert N.C. Nix, Sr. Federal Courthouse 900 Market Street, Suite 400 Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to attorney for movants:

Joseph Quinn, Esquire ROSS, QUINN & PLOPPERT, P.C. 192 S. Hanover Street, Suite 101 Pottstown, PA 19464

- If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Richard E. Fehling, United States Bankruptcy Judge on March 31, 2020 at 1:00 p.m. in:

**United States Bankruptcy Court** Courtroom #1, Second Floor Robert N.C. Nix, Sr. Federal Courthouse 900 Market Street, Suite 400 Philadelphia, PA 19107

- If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you are on the Clerk's Service List and you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the bankruptcy clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

## ROSS, QUINN & PLOPPERT, P.C.

/s/ Joseph Quinn\_ By:

Joseph Quinn, Esquire Attorney I.D. No. 307467

192 S. Hanover Street, Suite 101

Pottstown, PA 19464 T: 610.323.5300 F: 610.323.6081

JQuinn@RQPLaw.com Counsel for Debtor

Date: March 9, 2020